

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS IN THE DALLAS  
DIVISION**

**SHANE CRIDER,  
individually,**

**Plaintiff,**

**V.**

**1850 MOCKINGBIRD, LLC,  
a limited liability company,**

**Defendant.**

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**Case No. 3:22-cv-355-G**

**PLAINTIFF’S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the court’s Order, Plaintiff Shane Crider, through his undersigned counsel, hereby submits his initial disclosures to the Defendant, 1850 MOCKINGBIRD, LLC, limited liability company (hereinafter the “Defendant”) in the above-referenced lawsuit. These initial disclosures are based on the information presently known and reasonably available to Plaintiff at this time and are made without waiving any objections as to relevance, materiality or admissibility of evidence in the action. Continuing investigation and discovery may cause Plaintiff to amend these initial disclosures, including by identifying other potential witnesses, documents and by disclosing other pertinent information. Therefore, Plaintiff reserves the right to

revise, correct, supplement or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

By providing these initial disclosures, Plaintiff does not represent that he is identifying every document, tangible thing or witness possibly relevant to this action. In addition, these disclosures are made without Plaintiff in any way waiving his right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevancy and materiality, hearsay, undue burden, confidentiality, or any other appropriate grounds.

Each and every disclosure set forth below is subject to the above qualifications and limitations.

### **1. Individuals Likely to Have Discoverable Information**

The following individuals are likely to have discoverable information that Plaintiff may use to support his claims in this action:

1. Shane Crider, Plaintiff  
Contact via Strickland Law Firm, PLLC  
1452 Hughes Road, #200  
Grapevine, TX 76051  
(214) 478-2753

Subject of Information: The nature of Plaintiff's disability, his travels to the area of the subject facility, and the barriers encountered by Plaintiff at Defendant's subject facility.

2. Records Custodian(s) for Plaintiff (TBD)

Strickland Law Firm, PLLC, 1452 Hughes Road, #200, Grapevine, TX  
76051

(214) 478-2753

3. Records custodian(s) necessary for authentication of any documents.

In addition, Plaintiff anticipates that other, unknown individuals may have discoverable information that Plaintiff may use to support his claims. Plaintiff incorporates by reference any other individuals disclosed by other parties in this matter and reserves the right to supplement this disclosure pursuant to Federal Rule of Civil Procedure 26(e).

Plaintiff reserves the right to obtain discovery in support of his claims from any witness identified in any other party's Rule 26(a)(1) disclosure.

**2. Documents Relevant to Plaintiff's Claims**

Plaintiff submits the following description of documents, electronically stored information, and/or tangible things in his possession, custody or control that he may use to support his claims:

(i) Photographs depicting architectural barriers present at the Defendant's subject facility. Said photographs are maintained at Plaintiff's attorney's office, as undersigned.

(ii) All documents related to the costs, litigation expenses, and reasonable attorney fees incurred by Plaintiff and alleged to be recoverable including documents pertaining to his retention of the undersigned as counsel for him in this case. Said documents are maintained at Plaintiff's attorney's office, as undersigned.

(iii) Any and all documents identified by Defendant.

### **3. Computation of Damages**

Plaintiff states that he has suffered an injury-in-fact due to discriminatory conduct by Defendant. Plaintiff does not seek recovery of monetary damages from the Defendant in this action other than reimbursement from the Defendant of costs, litigation expenses, and reasonable attorney fees. Upon securing a judgment on the merits or a court-ordered consent decree, Plaintiff will present evidence of his costs, litigation expenses, and attorney fees to the Court where ordered to do so in accordance with applicable federal and local rules.

### **4. Insurance Agreements**

Not applicable.

Dated this the 14<sup>th</sup> day of April 2022.

By: /s/ Duncan Strickland

Duncan Strickland  
Counsel for Plaintiff

State Bar No.: 24072374  
1452 Hughes Road, #200  
Grapevine, Texas 76051  
Telephone: (214) 478-2753  
Facsimile: (832) 218-4317  
E-mail: [Duncan@StricklandLawFirm.com](mailto:Duncan@StricklandLawFirm.com)

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 14<sup>th</sup> day of April 2022, the foregoing document is being served this day on all counsel of record identified on the Service List set forth below via transmission of electronic mail.

*s/ Duncan Strickland*

### **SERVICE LIST**

#### **CUTLER-SMITH, P.C.**

Garrin Fant  
Texas Bar No. 00785430  
[gfant@cutler-smith.com](mailto:gfant@cutler-smith.com)

Nga Tran  
Texas Bar No. 24066805  
[ntran@cutler-smith.com](mailto:ntran@cutler-smith.com)

Christopher Cornell  
Texas Bar No. 24097535  
[ccornell@cutler-smith.com](mailto:ccornell@cutler-smith.com)

Cutler-Smith, P.C.  
Park Central 7  
12750 Merit Drive, Suite 1450  
Dallas, Texas 75251  
Telephone: 214-219-0800  
Facsimile: 214-219-0854